

EXHIBIT A

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UNITED STATES DISTRICT COURT
DISTRICT OF UTAH - CENTRAL DIVISION

Bill.com, LLC, Plaintiff, v. Danielle Cox, Defendant.	DECLARATION Case No. 2:23-cv-00026-HCN Hon. Howard C. Nielson, Jr. Hon. Magistrate Judge Daphne A. Oberg
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DECLARATION

I, Danielle Cox, pursuant to 28 U.S.C. § 1746, declare:

1. I am the Defendant in this action, over the age of 18 years old and have personal knowledge of the matters contained herein.
2. I could and would testify competently to such facts if called as a witness.

3. I was formerly employed as a Director of Information Technology for Bill.com, LLC (“BILL”).

4. In the course of my employment for BILL, I used a laptop computer that BILL issued to me, and some personal devices to access and/or store BILL’s electronic data, as a part of my position with BILL.

5. Below is the full and complete list of all devices, including but not limited to all phones, computers, tablets, external storage devices like hard drives or thumb drives that I used to access and/or store BILL’s electronic data:

- a. 16” MacBook Pro, which has been returned to BILL.
- b. 15” MacBook Pro
- c. iPhone 14 Pro

6. In the course of my employment for BILL, I used personal storage accounts to access and/or store BILL’s electronic data, as part of my position with BILL. Below is the full and complete list of all personal storage accounts, including all cloud-based storage accounts like iCloud and Dropbox, as well as cloud-based email services like Gmail, which I used to access and/or store BILL’s electronic data.:

- a. Daniellecox0@gmail.com

7. On Friday, January 26, 2023, I took the 15” MacBook Pro and iPhone 14 Pro to VRI Computer Forensics located at 105 South State Street, Suite 228, Orem, Utah 84058. Phone number 801.441.6877.

8. As I understand it, VRI did not take a forensic image of either the laptop or the phone, but searched for Bill.com information.

9. The iPhone 14 Pro synced with my email account daniellecox0@gmail.com, and as I understand it, once the forensic specialist deleted BILL's data associated with the email account nothing more could have existed on my phone.

10. Once VRI deleted the email account, I reset the iPhone 14 Pro back to factory settings.

11. I understand that BILL alleges that I stored its electronic data in a cloud-based iCloud account with the username "danielle.cox@getdivvy.com." I do not have access to that account, and have not had access since approximately December 21, 2022.

12. There were certain folders on my work-issued computer that were synced to the "danielle.cox@getdivvy.com" iCloud account. As I understand it, those folders were synced to the iCloud account and I understand that was the default setting when signing into iCloud at the time and it was necessary for software updates.

13. The password associated with danielle.cox@getdivvy.com is

[REDACTED]

14. I have not moved the contents of the danielle.cox@getdivvy.com iCloud account to any other device or account. The "danielle.cox@getdivvy.com" iCloud account is not my personal account and I will work with BILL to provide it access to the "danielle.cox@getdivvy.com" iCloud account to the extent that I am able to do so, in order for the third-party forensic vendor retained by BILL to remediate and remove all data and information pertaining to BILL from the account.

15. I agree to having the TRO in place. I have not used or disclosed any of BILL's confidential or proprietary information to any party not authorized to receive it and will not do so.

[signature page follows]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31 day of January, 2023.

Danielle Cox

Danielle Cox

Signature: 
Danielle Cox (Jan 31, 2023 12:20 MST)

Email: daniellecox0@gmail.com


2023.01.31 Declaration_Danielle Cox


Final Audit Report


2023-01-31


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